

Law Office of Hector M. Roman, P.C.  
108-14 Jamaica Avenue  
Richmond Hill, New York 11418  
718.533.8444

Hector M. Roman\*

FACSIMILE  
718.732-2151  
NOT FOR SERVICE

Sender's office extension: 1020  
Sender's email:  
hroman@roman-law.org

\*also admitted in CA and NJ

www.roman-law.org

October 22, 2024

**BY ECF**

Honorable Marcia M. Henry  
United States Magistrate Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: Adam White v. The City of New York, et al.,  
23 CV 6924 (RER)(MMH)

Your Honor:

My office represents Sholem Klein in the above-referenced matter. I write on behalf of all parties in this matter.

Per the Court's order, dated June 24, 2024, all fact discovery shall be completed by **10/28/2024** with a joint status report certifying the close of fact discovery due **11/04/2024**. Affirmative expert reports are due 12/02/2024; rebuttal expert reports are due 01/07/2025; depositions of experts shall be completed by 02/03/2025. All expert discovery shall be completed by **02/10/2025** with a joint status report due the same day certifying the close of expert discovery. The last day to take the first step in dispositive motion practice is **02/28/2025**. If no dispositive motion is filed, the parties shall file their joint pretrial order by **03/10/2025**.

However, as the Court knows, because the parties have been focused on settlement, the parties have not been pressing forward with discovery. A settlement conference is scheduled for **Monday, November 25, 2024 at 2:00 p.m.** before Magistrate Judge Robert M. Levy in **Courtroom 11B**.

As such, given that the parties cannot complete discovery within the current schedule, and in order to avoid the further time and expense of conducting additional fact discovery while a settlement conference is scheduled, the parties respectfully request that all discovery deadlines set forth above be adjourned *sine die*, to be rescheduled, if necessary, after the settlement conference.

Thank you for your kind consideration.

Very truly yours,

*Hector M. Roman*

Hector M. Roman

HMR/me

cc: Gideon Oliver, Esq. (via email and ECF)  
Joseph M. Hiraoka, Jr., Esq. (via email and ECF)